

Keith S. Dubanevich, OSB No. 975200
Cody Berne, OSB No. 142797
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Attorneys for Plaintiffs and the Class

[Additional Counsel on Signature Page.]

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

McKENZIE LAW FIRM, P.A., and OLIVER
LAW OFFICES, INC. on Behalf of
Themselves and All Others Similarly
Situated,

Plaintiffs,

v.

RUBY RECEPTIONISTS, INC.,

Defendant.

Case No. 3:18-cv-01921-SI

DECLARATION OF KEITH S.
DUBANEVICH IN SUPPORT OF
MOTION FOR FINAL APPROVAL AND
AWARD OF ATTORNEYS' FEES AND
EXPENSES AND SERVICE AWARDS
TO PLAINTIFFS

I, Keith S. Dubanevich, declare under penalty of perjury and in accordance with the laws of the State of Oregon and the United States that:

1. I am one of the attorneys from Stoll Berne who has actively worked on this case and the related case, *Maiden Insurance LLC v. Ruby Receptionists, Inc.*, Multnomah County

Page 1 – DECLARATION OF KEITH S. DUBANEVICH

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Circuit Court Case No. 17CV48545, during the past several years. I reviewed the time records showing our firm's actual time spent on these cases and the costs incurred and advanced by our firm in prosecuting this litigation.

2. All timekeepers in our firm contemporaneously record their actual time spent during the course of the matter. I am confident that this practice was followed for all timekeepers, including attorneys and paralegals, on these cases.

3. Stoll Berne's lodestar as of May 1, 2021—the total value of all time spent by Stoll Berne timekeepers, multiplied by each timekeeper's current hourly rate—is \$2,058,134. One timekeeper, Jacob Gill, no longer works at Stoll Berne. Mr. Gill's 2018 hourly rate – the last year of his employment with our law firm — was used to calculate the total value of his time spent on the cases.

4. Stoll Berne's lodestar does not include significant time on the cases spent after May 1, 2021, the cutoff date Class Counsel used to calculate fees and costs in connection with the Motion for Final Approval and Award of Attorneys' Fees and Costs and Service Awards to Plaintiffs. Work on the case after May 1, 2021 is expected to include drafting the motion for final approval and supporting declarations, preparing a reply in support of the motion for final approval, responding to inquiries from Settlement Class Members, and, if the Court grants final approval, addressing issues that arise in connection with claims administration.

5. The total hours Stoll Berne spent on these cases, as of May 1, 2021, was 4528.55.

6. In an exercise of billing judgment, Stoll Berne has written off the value of some time on this matter. The value of time that has been written off was not included in the lodestar.

7. The lodestar also does not include the amount of out of pocket costs advanced by Stoll Berne in prosecuting the cases.

8. A summary of time spent on this matter is attached as Exhibit 1 to this Declaration. Exhibit 1 shows the value of all time based on current hourly rates, by timekeeper.

Page 2 – DECLARATION OF KEITH S. DUBANEVICH

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Exhibit 1 also shows separately the various categories of costs advanced by Stoll Berne and the total of those costs. Each of those costs was necessarily incurred in the prosecution of the cases, and Stoll Berne keeps contemporaneous records of all costs as they are incurred and paid. Stoll Berne advanced \$104,014.83 in out of pocket costs in this matter.

9. I know from my review of my firm's time records, and from my ongoing involvement in these cases, that Stoll Berne invested substantial time analyzing the factual and legal issues; briefing and arguing motions; reviewing and analyzing documents and data; consulting with an expert and clients; preparing for, taking, and defending depositions; attending mediations which spanned multiple sessions and negotiations; and negotiating, memorializing, and finalizing the terms of the proposed settlement. I can confidently say that Class Counsel invested significant resources, and took on significant risks, in prosecuting these cases to a successful conclusion. I can also say that the substantial time Stoll Berne spent limited other potential cases that Stoll Berne could accept.

10. My colleague Cody Berne and I reviewed our firm's time records to allocate the time spent among several different categories, including: (a) case assessment, pre-filing investigation, initial complaint; (b) briefs, motions, pleadings, research; (c) discovery and post-filing investigation; (d) class certification; (e) experts and consultants; (f) court appearances and preparation; (g) conferences, interviews, telephone calls, meetings, correspondence; and (h) settlement. When a time entry could be included in more than one category, we used our judgment to assign the entry to only a single category.

11. While a number of attorneys and other timekeepers in my firm have recorded time on this matter, the bulk of the time was recorded by myself and Mr. Berne.

12. A summary of my professional experience and Mr. Berne's professional experience was submitted as a Declaration [ECF 109] and Corrected Declaration [ECF 111] in Support of Motion for Class Certification. *See also* ECF 109, Exh. 1 and 2 (law firm biographies

Page 3 – DECLARATION OF KEITH S. DUBANEVICH

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Exhibit 2

for Mr. Dubanevich and Mr. Berne). My current standard hourly rate is \$635. Mr. Berne's current standard hourly rate is \$415.

13. The standard hourly rates for attorneys at my firm range between \$365 and \$745, and the standard hourly rates for paralegals range between \$290 and \$315.

14. Each year, my firm reviews and adjusts billing rates based on a number of factors, including but not limited to the experience, skill, and sophistication required for the types of legal services provided by our firm to clients; the rates customarily charged in similar local and national markets for the types of services provided; and the experience, reputation, and ability of each of the attorneys and staff members.

15. Our firm also considers, particularly for work such as our representation of the Plaintiffs and the Class in this matter, that because of the nature of the action and the contingent nature of any recovery of our time and costs, that our firm may not be paid for long periods of time, if at all.

16. For example, in these cases our firm advanced the value of all time invested in the matter plus significant out of pocket costs for over 3.5 years, all while risking the possibility that we would never recover those amounts. While our firm deeply believes that such work is important to the legal system and the public, we take significant risks by investing time and money in matters which do not pay on a monthly or regular basis.

17. For that reason and others, our firm anticipates that cases of that risk profile will produce some degree of multiplier over the lodestar (typically two to three times the lodestar), although that will not happen under the terms of the proposed settlement in this matter. In fact, the combined value of the time invested by Class Counsel in these cases is far in excess of the amount the defendant agreed to pay.

18. I reviewed the Morones Survey of Commercial Litigation Fees, Portland, Oregon (2020) and the Oregon State Bar 2017 Economic Survey. The data in the Morones Survey is one

Page 4 – DECLARATION OF KEITH S. DUBANEVICH

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year old, while the data in the Bar's survey is over four years old. My current standard hourly rate of \$635 is slightly over the \$623 average rate in the Morones Survey for respondents with over 30 years' experience and the Bar's \$610/hr average rate for the 95th percentile of lawyers in the Portland area in private practice with over 30 years' experience. Mr. Berne's current hourly rate of \$415 is higher than the \$344/hr average rate in the Morones Survey for attorneys with 6 years' experience and the Bar's \$350/hr average rate for the 95th percentile of lawyers in the Portland area in private practice with over 6 years' experience.

19. The years of experience of the other timekeepers, along with their hourly rates, are: Steve D. Larson (30+ years, \$650); Timothy S. DeJong (25+ years, \$605); Steven C. Berman (25+ years, \$525); Jacob S. Gill (15+ years, \$385); Megan K. Houlihan (5 years, \$415); Lydia Anderson-Dana (4.5 years, \$415); Elizabeth K. Bailey (3.5 years, \$415); Sophie von Bergen (less than 1 year, \$325); Jason Dotts (paralegal, \$290, 21 years); Angelene Falconer (paralegal, \$290, 19 years); Margarita Fortner (paralegal, \$290, 12 years); and Wes Mueller (paralegal, \$290, 5 years).

20. Attached as Exhibit 3 is a true and correct copy of my law firm resume.

I hereby declare that the above statements are true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty of perjury.

DATED this 11th day of May, 2021.

By: 
Keith S. Dubanevich

Page 5 – DECLARATION OF KEITH S. DUBANEVICH

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Stoll Berne
Time report through May 1, 2021

Name	A	B	C	D	E	F	G	H	Total Hours	Hourly Rate	Total Lodestar
PARTNERS:											
Keith S. Dubanevich	14	372.1	231.15	175.4	36.95	159.9	237.15	101.95	1328.6	\$635	\$843,661.00
Steve D. Larson	.4	0	0	0	0	0	0	0	0.4	\$650	\$ 260.00
Timothy S. DeJong	0	.2	0	0	0	0	0	0	0.2	\$605	\$ 121.00
Steven C. Berman	0	5.3	0	0	0	0	.9	0	6.2	\$525	\$ 3,255.00
ATTORNEYS:											
Jacob S. Gill	19.5	11.1	13.5	0	0	0	11	11	66.1	\$385	\$ 25,448.50
Cody Berne	1.8	1073.1	299.2	201.3	48.2	77	260.4	14.3	1975.3	\$415	\$819,749.50
Lydia Anderson-Dana	0	0	0	0	0	0	.3	0	0.3	\$415	\$ 124.50
Megan K. Houlihan	0	146.3	0	0	0	18.1	29.8	0	194.2	\$415	\$ 80,593.00
Elizabeth K. Bailey	0	14.6	0	0	23.2	0	1.6	0	39.4	\$415	\$ 16,351.00
Sophie von Bergen	0	66.2	0	0	0	0	2.2	0	68.4	\$325	\$ 22,230.00
PROFESSIONAL SUPPORT STAFF:											
Jason Dotts (paralegal)	0	0	13.1	0	0	0	.3	0	13.4	\$290	\$ 3,886.00
Angelene Falconer (paralegal)	0	.9	1.2	0	0	3	1	0	6.1	\$290	\$ 1,769.00
Margarita Fortner (paralegal)	0	.7	151.1	0	0	0	.3	0	152.1	\$290	\$ 44,109.00
Wes Mueller (paralegal)	0	63.4	571.15	5.6	15.3	10	12.4	0	677.85	\$290	\$196,576.50
TOTAL LODESTAR	35.7	1753.9	1280.4	382.3	123.65	268	557.35	127.25	4528.55		\$2,058,134.00

CATEGORIES

- a. Case Assessment, Pre-Filing Investigation, Initial Complaint
- b. Briefs, Motions, Pleadings and Research
- c. Discovery and Post-Filing Investigation
- d. Class Certification

- e. Experts & Consultants
- f. Court Appearances & Preparation
- g. Conferences, Interviews, Telephone Calls, Meetings & Correspondence
- h. Settlement

Exhibit 1

Exhibit 2

Joint Declaration in Support of Motion for Final Approval and Award of Attorney Fees and Costs and Service Awards to Plaintiffs

Stoll Berne
Costs through May 1, 2021

<u>Categories:</u>	<u>Amount</u>
Photocopies/Reproduction	\$ 0.00
Postage/Notice Costs	\$ 1,303.40
Telephone	\$ 148.94
Messengers/Express Services	\$ 517.62
Filing/Witness Fees	\$ 4,858.00
Court Reporters/Transcript/Video	\$38,861.15
Computer Research (Lexis, Pacer, etc.)	\$ 248.80
Experts/Consultants/Professional Services	\$45,681.08
Document and Data Management Expenses	\$ 725.21
Mediation	\$10,000.00
Out-of-Town Meals/Hotel/Transportation	\$ 1,670.63
Facsimile Charges	\$ 0.00
TOTAL EXPENSES:	\$104,014.83

Exhibit 2

Exhibit 2

Joint Declaration in Support of Motion for Final Approval and Award of Attorney Fees and Costs and Service Awards to Plaintiffs

Page 7 of 23

Stoll Berne

Keith Dubanevich Attorney

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in LinkedIn



Keith is an accomplished trial, appellate, and healthcare lawyer with over 35 years of experience in more than a dozen different jurisdictions around the country. With a focus on complex dispute resolution, with particular emphasis in the healthcare industry, Keith is adept at handling multi-state and international antitrust cases, consumer litigation, and securities disputes. In healthcare, he has handled peer review disputes, partnership and incorporation matters, and billing investigations.

Keith's clients value his keen instincts in court and his ability to delve into complex legal issues while never losing sight of the overall strategy of a case. A judge commented that during a recent trial Keith was "remarkably thorough, ... prepared, respectful, and efficient." Keith has also received high praise from his peers including this comment about a recent arbitration proceeding: "I was so impressed with your professionalism and effectiveness. Your whole presentation was a model of what an advocate should be."

During his time at the Oregon Department of Justice as Associate Attorney General and Chief of Staff, Keith led the creation of a civil rights unit, managed securities litigation including multiple cases against financial services companies, and supervised antitrust investigations and prosecutions. He was also involved with the adoption of legislation that expanded the Unlawful Trade Practices Act to include financial services companies.

EDUCATION

Tulane University School of Law, J.D., *cum laude*, 1983

Moot Court Board

Louisiana Trial Lawyers Award for Outstanding Advocacy

Order of the Barristers

Northeastern University, B.S., Public Administration, with high honors, 1980

A.A. White Dispute Resolution Center, Mediation Certificate, 1997

ADMITTED TO PRACTICE

Oregon State Bar, 1998
Texas State Bar, 1983
U.S. District Court, Oregon
U.S. District Court, Connecticut
U.S. District Court, Northern Florida
U.S. District Court, Southern New York
U.S. District Court, Southern Texas
U.S. District Court, Eastern Texas
U.S. District Court, Western Wisconsin
U.S. Court of Appeals, Second Circuit
U.S. Court of Appeals, Fifth Circuit
U.S. Court of Appeals, Ninth Circuit
U.S. Supreme Court
Massachusetts, 1990 (Inactive)

PROFESSIONAL EXPERIENCE

Stoll Berne
Shareholder, 2012-present

Oregon Department of Justice
Associate Attorney General and Chief of Staff, 2012-2012
Chief of Staff and Special Counsel, 2009-2012
Special Counsel, 2009

Garvey Schubert Barer
Shareholder, 1998-2008

Fulbright & Jaworski L.L.P. (Houston, Texas)
Partner, 1992-1998
Associate, 1983-1988, 1989-1992

Hale & Dorr (Boston, Massachusetts)
Associate, 1988-1989

PROFESSIONAL ACTIVITIES

Oregon Law Commission
Commissioner, 2016-present

Oregon State Bar
Antitrust and Trade Regulation Section Executive Committee, Chair, 2018; Chair-elect, 2017; 2015-present
Business Litigation Section Executive Committee, 2002-2009; Chair, 2008; Chair-elect, 2007; Treasurer, 2007; Secretary, 2006

American Bar Association
Antitrust and Litigation Sections, Member

COMMUNITY ACTIVITIES

Children's Cancer Association
Legal Advisor, 2017-present

Mazamas Mountaineering Association
Board of Directors, Chair, 2007

Hoyt Arboretum Friends
Board of Directors, 2012-2017; President, 2013-2017

PRESENTATIONS

"Wait Wait ... Don't Settle! The Vital Pre-Settlement Role of a Settlement Administrative Expert," Epiq & HB Litigation Conference, Virtual (April 2021)

"Deposing the Organization," Multnomah Bar Association CLE, Portland, Oregon (March 2020)

"Proportionality in Practice," Oregon State Bar Business Litigation Section CLE, Portland, Oregon (September 2017)

"Oregon Public Employee Retirement Fund v. Marsh & McLennan: Lessons Learned," Oregon State Bar Business Litigation Section CLE, Portland, Oregon (May 2017)

"Telephone Consumer Protection Act," Oregon Trial Lawyers Association, Portland, Oregon (May 2014)

"US Supreme Court Update: Chadbourne & Parke v. Troice; Mississippi v. Au Optronics; and Halliburton v. Erica John Fund. What's changed and what's coming up next session." Oregon State Bar Securities Regulation Section CLE, Portland, Oregon, (June 2014)

PUBLICATIONS

"Presidential Tweets, Yelp Reviews, FREE BOOZY, and Admissibility," OSB Litigation Journal (Fall 2017)

"Class Arbitration: Permissible? Preventable? Who Gets to Decide?" 26 Oregon State Bar Litigation Journal 3 (2007)

"Jurisdiction: In Personam and In Rem," 1 Oregon Civil Pleading and Practice Chapter 2 (2006)

"Personal Jurisdiction in a Virtual World," Texas Bar Journal, February 2003

"A Brief Introduction to Product Liability Law in the United States," China Chamber of Commerce for Machinery and Electronics News Report, 3rd Issue, 2002

"Minimizing Exposure – Personal Jurisdiction in the Silicon Forest," 62 Oregon State Bar Bulletin 21 (December 2001)

"You Can Advertise, But Don't Sell That Product: Virtual Jurisdiction in Washington," Washington Law Journal, June 2001

"Personal Jurisdiction in the Silicon Forest," Oregon Law Journal, June 2001

"Health Care Litigation and Confidentiality – Unique Discovery Issues," Oregon Health Law (Summer 2000)

"State by State Guide to Managed Care Law," Oregon, Aspen Publishing (1999, 2000, 2001)

"Qui Tam Suits," Oregon Health Law (Winter, 1998/1999)

"Whistle-Blower Reward Programs Signal the Need to Accelerate Compliance Efforts," Patient Accounts, Healthcare Financial Management Association (August 1998)

PERSONAL

Keith is an avid runner, skier, and cyclist. In his spare time, he enjoys cooking with his wife and family.

AWARDS

Benchmark Litigation

Local Litigation Star, 2015-2021

Martindale Hubbell

AV* Rated

Oregon Super Lawyers

2006-2009; 2014-2020

The Best Lawyers in America®

2014-2021

Lawyer of the Year, Portland: Litigation – Antitrust, 2020

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Cody Berne is an attorney at Stoll Berne in Portland. Cody's practice focuses on representing investors who lost money because of fraud and other misconduct, class actions, and business litigation. He is a member of the Public Investors Advocate Bar Association and the Oregon Trial Lawyers Association.

Cody previously worked as a deputy district attorney at the Multnomah County District Attorney's Office where he tried over 30 trials to verdict. Before that, Cody represented individuals and businesses in cases involving investment fraud and a wide range of business disputes at a large Portland firm.

He received the Haglund Award in 2016 from the Multnomah Bar Association and was named in The Best Lawyers in America in 2020.

During law school, Cody interned for U.S. District Court Judge Kimberly Mueller and U.S. Magistrate Judge Carolyn Delaney. Elected to Order of the Coif, he received the Clinical Legal Education Association Award and a Witkin Award. Cody also represented clients as a law student at the Civil Rights Clinic and Prison Law Clinic and earned a Public Service Certificate.

Before law school, Cody worked as a police officer with the Portland Police Bureau and as a wildland firefighter.

[Investor Blog](#)

Exhibit 3
Page 4 of 16

Exhibit 2

EDUCATION

UC Davis School of Law, J.D., Order of the Coif, 2014

Pomona College, B.A., Politics, 2003

ADMITTED TO PRACTICE

Oregon State Bar, 2014

U.S. District Court, Oregon

U.S. Court of Appeals, Ninth Circuit

PROFESSIONAL EXPERIENCE

Stoll Berne

Associate, 2017-present

Multnomah County District Attorney

Deputy District Attorney, 2016-2017

Miller Nash Graham & Dunn LLP

Associate, 2014-2016

Hon. Kimberly Mueller (U.S. District Court, Eastern District of California)
Intern, 2012

Hon. Carolyn Delaney (U.S. District Court, Eastern District of California)
Intern, 2012

Portland Police Bureau

Police Officer, 2005-2011

Diamond Mountain Interagency Hotshots

Wildland Firefighter, 2004

PROFESSIONAL ACTIVITIES

FINRA

Arbitrator, 2020-present

Legal Aid Services of Oregon

Volunteer, Domestic Violence Project, 2015-2016

National Futures Association (NFA)

Arbitrator, 2021-present

Oregon State Bar

Antitrust Section, Member

Securities Regulation Section, Member, 2017-present; Executive Committee, 2021-present

Oregon Trial Lawyers Association

Legislative Committee Member, 2020-present

Public Investors Advocate Bar Association (PIABA)

Member

PUBLICATIONS

"[Investor Blog](#)," *Stoll Berne*, 2020-present

"Costs, Disbursements, and Attorney Fees," author, *Oregon Civil Pleading and Litigation*, 2020

"After the Supreme Court's Decision in *China Agritech*, a Plaintiff Who Seeks to Represent a Class Should Not Wait to File," *Oregon State Bar Litigation Journal*, Summer 2020

"Common Claims of Oregon Investors Who Are the Victims of Fraud or Other Financial Misconduct," *Stoll Berne*, January 2019

"Contracts for the Sale of Goods," co-author, OSB Legal Publications CLE, *Damages*, 2016

"Don't Take Your Guns to Town," *Oregon State Bar Bulletin*, October 2015

"Liabilities under State Statutory and Common Law: Blue Sky Laws," 2014 *Broker-Dealer Litigation Annual Survey*, Securities Litigation Committee of the America Bar Association

PRESENTATIONS

"How Plaintiff's Lawyers Evaluate an Investor Fraud Case," Deschutes County Bar Association CLE, Bend, Oregon (March 2019)

AWARDS

Multnomah Bar Association
Haglund Award, 2016

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2020-2021

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Exhibit 3
Page 6 of 16

Exhibit 2

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Meg Houlihan

Attorney

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✉ mhoulihan@stollberne.com



Meg is an associate in the firm's litigation group where she focuses on complex litigation matters. Prior to joining Stoll Berne, Meg was an associate in another Portland law firm and also had served as a judicial law clerk for the Honorable Morgan Christen (U.S. Court of Appeals, Ninth Circuit) and the Honorable Michael Simon (U.S. District Court, District of Oregon). During her clerkships, Meg was able to provide legal research for both civil and criminal matters and worked on several trials. Her previous law firm experience included a lien dispute for former police officers as well as a civil RICO matter in federal court, and a federal jury trial on behalf of a hospital.

EDUCATION

Yale Law School, JD, 2015

Teaching Fellow

Trial Advocacy Team Member

Submissions Editor for Yale Law & Policy Review

Environmental Protection Clinic Member

Gonzaga University, *summa cum laude*, B.A., Political Science and History Majors, 2010

ADMITTED TO PRACTICE

Oregon State Bar, 2016

Washington State Bar, 2018

PROFESSIONAL EXPERIENCE

Stoll Berne

Associate, 2020-present

Tonkon Torp

Associate, 2017-2020

The Honorable Morgan Christen (U.S. Court of Appeals, Ninth Circuit)

Law Clerk, 2016-2017

The Honorable Michael Simon (U.S. District Court, District of Oregon)

Law Clerk, 2015-2016

Munger, Tolles & Olson, LLP (Los Angeles)

Summer Associate, Summer 2014

King County Prosecutor's Office (Seattle)

Extern, Summer 2013

PROFESSIONAL ACTIVITIES

Multnomah Bar Association

Member

Oregon State Bar

Member

Owen M. Panner American Inn of Court

Member

COMMUNITY ACTIVITIES

St. Mary's Academy

Mock Trial Coach, 2018-present

PERSONAL

You may find Meg during her off time running, hiking, or participating in all the Pacific Northwest outdoor adventures.

AWARDS

Oregon State Bar President's Special Award of Appreciation

2019

Oregon Super Lawyers

2020, Rising Star

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Exhibit 3
Page 8 of 16

Exhibit 2



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Exhibit 3
Page 9 of 16

Exhibit 2
Support of Motion for Final Approval and Award of Attorney Fees and Costs and Service
Page 16 of 23

A BELIEF IN SOCIAL RESPONSIBILITY

Stoll Berne gives back to its community. Every year, the firm donates a generous percentage of gross revenues to charitable causes. We are a major contributor to the Lawyers' Campaign for Equal Justice, which provides legal services funding to low-income Oregonians. Many of our lawyers donate their time to pro bono legal work, including representing seniors, indigent clients and migrant workers. Our community partners include Self Enhancement, Inc., Community Cycling Center, Ronald McDonald House of Oregon and Southwest Washington, Hoyt Arboretum Friends, CASA, Hands on Portland and Oregon Food Bank. We also participate in charitable fundraising and coach high school mock trial teams.

PERSONAL INTEGRITY AND PROFESSIONAL EXCELLENCE

Our attorneys are selected for their personal integrity, sound judgment and superior academic achievement. Many of our lawyers finished at or near the top of their class at the nation's premier law schools, and continue to receive professional honors and accolades. We are consistently peer-rated as among the best lawyers in Oregon, and frequently cited for our publishing in professional journals. Our lawyers are regularly invited to professional speaking engagements.

Exhibit 3

Page 10 of 16

Exhibit 2

A PRACTICAL ATTITUDE TOWARD PREVENTING AND RESOLVING DISPUTES

Stoll Berne represents individuals, small and large corporations, financial institutions, and government entities. Our clients, from individuals and closely held corporations to Fortune 500 companies, all have one thing in common – they seek exceptional legal representation. By choosing to concentrate our practice on focused areas of expertise, we offer our clients the opportunity for continued success.

KEY PRACTICE AREAS:

Securities/Investor/Broker Litigation

We regularly represent plaintiffs/claimants and defendants/respondents in cases involving stocks, bonds, limited partnerships and other investment vehicles, disputes between stockbrokers and customers (e.g., misrepresentation and suitability claims), and claims for management malfeasance at the expense of shareholders or investors. Our clients include both individual and institutional investors, as well as defendants, in financial fraud class actions.

Business Litigation

Whether our clients initiate or are defendants in litigation, we aggressively represent them to obtain the best results. We are regularly retained in “bet the company” litigation and are experienced in state and federal courts and arbitrations. Our clients turn to us for assistance with a variety of business matters such as contract, breach of fiduciary duty, fraud, real estate, employment and professional malpractice disputes.

Class Action Litigation

We have represented many types of class members in a variety of class actions including: employees in wage and hour class actions; businesses damaged by environmental spills; health care providers and the disabled in class actions for reimbursement of health care costs; investors in securities fraud class actions; and consumers in cases involving improper fees, deception, and price fixing.

Exhibit 3

Page 11 of 16

Exhibit 2



Real Estate Law

Our real estate lawyers regularly represent clients in the purchase and sale of real estate, real estate financings (including mezzanine loans), development of real property, development incentives, capital formation (including private placements and joint venture equity arrangements), leasing, tax-deferred property exchanges, affordable housing, condominiums, and disposition and development agreements with local municipalities.

Patent/Trademark/Intellectual Property Litigation

We represent parties in all aspects of intellectual property litigation, including disputes involving patents, trademarks, trade secrets, copyrights, false advertising, unfair competition, defamation and medical research practice. We are frequently consulted by patent and trademark counsel when litigation develops and often are asked to serve as trial counsel.

Business Transactions/Corporate Law

We represent and advise clients on business formations, capital formation, financing, licensing, leasing, executive compensation, employment law, corporate governance, business succession planning, equity owner retirements, tax planning and regulatory compliance.

Antitrust and Unfair Trade Practices

We represent U.S. and international companies and consumers in all aspects of antitrust litigation. Our antitrust experience includes trials in state and federal court and in arbitration. We have litigated cases involving allegations of price-fixing, customer allocation, market division, price discrimination, tying or bundling related products, and unfair or deceptive trade practices.

Learn more about our areas of practice at
stollberne.com

Exhibit 3
 Page 12 of 16

Exhibit 2

WHO WE ARE

Deeply rooted in the Northwest and nationally recognized for over 35 years, Stoll Berne has produced extraordinary results through practical, strategic and tenacious representation. We are proud that more than half of our client list originates from referrals by satisfied clients and peers. We keep our firm small in order to provide efficient services in specialized areas in which we have significant experience.



Exhibit 3

Page 13 of 16

Exhibit 2



CONTACT US



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Portland, Oregon 97204



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Exhibit 3
Page 14 of 16

Stoll Berne

Class Actions

We have earned our reputation as the leading plaintiffs' class actions firm in Oregon. We have litigated securities fraud class actions on behalf of investors. We have represented employees in class actions involving wage and hour claims. We have represented consumers in consumer protection class actions and in antitrust cases. We have represented injured people and businesses in environmental class actions. We have also represented health care providers seeking to recover proper reimbursement in class actions against insurance companies. Our class actions practice fights to level the playing field and find justice.



Protecting Your Rights is Our Business

To learn more about us and our class actions practice, please watch the video to the left.

To visit our [Class Actions Blog](#), click [here](#). If you would like to receive emails with our latest blog posts, you may sign up directly on the blog or simply send us an email via our [Contact Us](#) page with the request.

We Amplify Your Voice When You Feel Voiceless



Fighting to Level the Playing Field and Find Justice

Tell us about your case

Please contact us for a no-cost, no-obligation, strictly confidential consultation.

Get Started

Class Actions Attorneys



Lydia Anderson-Dana
Attorney



Steven Berman
Attorney



Cody Berne
Attorney



Gary Berne
Attorney & Founder



Timothy DeJong
Attorney



Keith Dubanevich
Attorney



Emily Johnson
Attorney



Keith Ketterling
Co-Managing Attorney



Steve Larson
Attorney



Keil Mueller
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